



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

November 16, 2014

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MR. STEVEN R. SPAULDING  
CENTRAL GARDEN & PET COMPANY  
1501 EAST WOODFIELD ROAD, SUITE 200 WEST  
SCHAUMBURG, IL 60173

Dear Mr. Spaulding:

Subject: Transfer of Pesticide Registrations and Data From Company Number 655 to  
Company Number 89459

Pursuant to your request in your letter and transfer agreement of June 04, 2014, we  
have approved the transfer of the following registrations from **PRENTISS LLC**, company  
number **655** to **CENTRAL GARDEN & PET COMPANY**, company number **89459**.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
PRENTOX CUBE POWDER	655-3	89459-13
PRENTOX PYRONYL 50-5 OIL CONCENTRATE	655-52	89459-14
PRENTOX CUBE RESINS	655-69	89459-15
PRENTOX 20% PYRETHRUM EXTRACT	655-75	89459-16
PRENTOX PYRONYL 75	655-87	89459-17
PRENTOX PYRONYL 60-6 EMULSIFIABLE CONCENTRATE	655-90	89459-18
PRENTOX PIPERONYL BUTOXIDE TECHNICAL	655-113	89459-19
PRENTOX PYRONYL 9 18-30	655-128	89459-20
PRENTOX PYRONYL 6-15-15	655-316	89459-21
PRENTOX PYRETHRUM CRUDE EXTRACT	655-407	89459-22
PRENTOX PRENFISH TOXICANT	655-422	89459-23
PRENTOX PYRONYL OIL CONCENTRATE #525	655-471	89459-24
PRENTOX PYRETHRUM EXTRACT	655-486	89459-25
PRENTOX PYRONYL CROP SPRAY	655-489	89459-26
PRENTOX PYRONYL OIL CONCENTRATE OR-3610A	655-501	89459-27

PRENTOX PRENBAY 1% OIL SOLUTION	655-546	89459-28
PRENTOX EMULSIFIABLE SPRAY CONCENTRATE #96	655-587	89459-29
PRENTOX FOGGING INSECTICIDE PF	655-643	89459-30
PRENTOX PYRONYL UL-100 CONCENTRATE	655-665	89459-31
PRENTOX ROTENONE FISH TOXICANT POWDER	655-691	89459-32
PRENTOX PBO 8	655-736	89459-33
PRENTOX PYRETHRUM EXTRACT REFINED CONCENTRATE	655-754	89459-34
PRENTOX INSECT SPRAY AND FOGGING CONCENTRATE #1	655-773	89459-35
PRENTOX 5 LB. MALATHION SPRAY	655-777	89459-36
PRENTOX PERM-X 1E	655-783	89459-37
PRENTOX FOG AND MILL SPRAY	655-784	89459-38
PRENTOX PRENBAY 1.5 EC	655-796	89459-39
PRENTOX PYRONYL 303 EMULSIFIABLE CONCENTRATE	655-797	89459-40
PRENTOX EXCITER	655-798	89459-41
PRENTOX PYRONYL 303 CONCENTRATE	655-801	89459-42
BRITTLE EXTRACT OF CUBE ROOT	655-808	89459-43
PRENTOX PERM-X UL 30-30	655-811	89459-44
PERM-X UL 31-66	655-812	89459-45
PRENTOX PERM-X UL 2-2	655-813	89459-46
PERM-X UL 4-4	655-898	89459-47
PRENTOX CFT LEGUMINE FISH TOXICANT	655-899	89459-48
PRENTOX PERM-X AQUA 20-20	655-900	89459-49
PRENTOX PERM-X AQUA 30-30	655-901	89459-50

<u>SLN Number</u>	<u>Old Registrant/ Company Number</u>	<u>New Registrant/ Company Number</u>
IL110002	655	89459
MO100004	655	89459
UT040001	655	89459
UT050003	655	89459

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after

the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee

is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated June 04, 2014 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **CENTRAL GARDEN & PET COMPANY** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief  
Information Services Branch  
Information Technology & Resource Management Div. (7504P)

cc: MS. JANELLE KAY  
PYXIS REGULATORY CONSULTING, INC., AGENT FOR  
PRENTISS LLC  
4110 136TH STREET, NW  
GIG HARBOR, WA 98332

**RE: 655\_RAD\_89459\_11\_16\_2014**